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1 Slope.

2 Q Okay. Was it your job to be sure that the people that
3 were below you on the org chart had that information as
4 to changes that needed to be complied with?

5 A No. No, it was general knowledge. You just -- I mean,
6 you could get one of those manuals anywhere.

7 Q So it was just hit or miss, you didn't have discussions
8 about them?

9 A Oh, we were all in -- we helped to review this thing
10 months in advance. So everybody was in the know as to
11 what it was. So it looks to me like somebody in --
12 e-mailed to me and I just passed it on to everybody
13 else.

14 Q Okay. Within the safety department, if somebody in the
15 field needed a piece of equipment did you have
16 authority to purchase that or to authorize purchase of
17 it?

18 A It may have had authority to opera- -- to authorize the
19 purchase or -- or get it.

20 Q Okay. And within the budget for the department itself,
21 did you come up with a wish list, so to speak, or
22 contribute to what kinds of equipment needed to be
23 purchased for the department?

24 A Yes, I think you see that here in this next bullet. We
put together a list, and I just went through and asked

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1 everybody what we -- what they thought we needed and we
2 put together a list and I put them together here.

3 Q Okay.

4 A It just.....

5 Q Well have -- here's something called an instrument
6 replacement analysis.

7 A Uh-huh (affirmative).

8 MS. ZOBEL: And madame court reporter would you
9 pass them a sticker please?

10 MR. COVELL: I've got the stickers.

11 MS. ZOBEL: Oh, all right.

12 MR. COVELL: So we'll mark this G-8 for the
13 record.

14 (Deposition Exhibit G-8 marked)

15 MS. ZOBEL: That's fine.

16 Q (By Ms. Zobel) Do you recognize this? It has your
17 name in the right-hand corner.

18 A Oh, yes, this is a spreadsheet I built. Okay.

19 Q What is it you did?

20 A Let's see here.

21 Q I don't know if this is all of it, but tell me what
22 this page represents.

23 A Well give me a second. I'll get up to speed here. It
24 looks like I was trying to come up with a cost analysis
of -- we had some old equipment on there. Some old

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1 down. You can't work any more. You know, taking the
2 hard line. And then the other side would be, you know,
3 you guys, you know, you might want to reconsider what
4 you're doing and try a different approach.

5 Q Okay. So if the pendulum was on the side of the cop
6 mentality, if the perception of corporate was -- or
7 Gary Buchanan was -- that we weren't following through
8 on that, what would role be then? To communicate that
9 to the troops or what?

10 A Yes.

11 Q Okay. If there had bene a violation of safety that
12 came to your attention, did you ever suggest that there
13 be new training implemented?

14 A Could have, yes.

15 Q And would you recommend ever that there be transfers or
16 anything like that of individuals?

17 A I don't think I would have ever made a recommendation
18 that somebody get transferred. I might have gotten mad
19 at somebody and said take a day off, but there's really
20 nothing formal there at all so --

21 Q Okay.

22 A It's -- you know, it's difficult being the safety guy
23 out there because the last thing you want is somebody
24 to get hurt while you're trying to keep them safe so --

Q Yes. In addition to having federal and state

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1 regulations that you had to follow in safety -- and
2 that's a given, you did have to follow state and
3 federal regulations, correct?

4 A Correct.

5 Q Were there compliance requirements from clients as well
6 -- from the client?

7 A Yes.

8 Q Okay. So did your responsibilities include working
9 with the client in any manner in developing those
10 requirements?

11 A Not in developing the clients' requirements. I worked
12 with the client.

13 MR. COVELL: And just to be clear, these are
14 client safety requirements, right?

15 MS. ZOBEL: Yes, yes. Safety -- within his
16 field, right.

17 MR. COVELL: Okay.

18 Q (By Ms. Zobel) And how would you work with the client?
19 Explain that to me. What were your interfaces?

20 A I might go to a drill pad and meet with one of the
21 client's safety specialists or their super- --
22 supervisory personnel and walk down a job.

23 Q Meaning walk down a job -- what's that mean?

24 A Just walking down for safety issues -- safety problems.

Q And what would happen if there were safety issues

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1 Q Okay. Are you doing that as a back-up to these people
2 or as a substitute when somebody else isn't available
3 or --

4 A Both.

5 Q Both. Okay. All right. And this -- the amount of
6 time that you did these kinds of activities was what?

7 A I don't know. At random, it could be on a daily basis
8 some shifts on the Slope or it could be a weekly basis.
9 Some weeks maybe not at all.

10 Q Intermittent?

11 A All over the board.

12 Q But is that accurate that it would be intermittent or
13 on an as-needed basis as opposed to that being your
14 first responsibility?

15 A Oh, I think that was a primary responsibility was not
16 office work, but a primary responsibility would be to
17 make sure that everybody in the field is taken care of
18 before the paperwork is taken care of in the office.
19 So, if you wanted to assign priorities, the field work
20 would come first and then everything else would be
21 secondary.

22 Q Okay. Within the assigned activities that you were
23 doing though, how often would you have to exercise this
24 as compared with the office work that you also had to
do?

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1 correct me if I'm wrong, the client came to you and
2 said, we're going to start doing this NORM testing?
3 You then got the resources, you found the information
4 that was needed to comply with what they wanted, you
5 put it in a procedure that went into the manual, and
6 was disseminated to the employees, is that correct?

7 A Yes.

8 Q Okay. Would this have been a similar process in doing
9 a -- this is a suspended personnel platform lifting
10 procedure form, did you develop this?

11 A No.

12 Q Who did?

13 A It was Don Chenault did this one.

14 Q Okay. It's out of your folder, it looks like.

15 A Yes, because I was taking everybody's items and
16 assimilating them into one location.

17 Q Okay.

18 COURT REPORTER: G-14 marked.

19 MR. COVELL: Yes, ma'am.

20 (Deposition Exhibit G-14 marked)

21 Q (By Ms. Zobel) When you got a section like this from
22 somebody else, did you read them over, and check them
23 over for accuracy?

24 A Yes, we all swapped back and forth. I mean, there was
-- I don't know -- recall right offhand how many

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1 different sections there are of this thing. It's a
2 huge document. So every time somebody would develop
3 more, we'd all take turns redlining it for each other.

4 Q I saw a -- I don't know where it is now. I saw a memo
5 that you sent out to people about the procedure of
6 putting together this manual, and you noted in that
7 manual -- in that thing, that this was going to be a
8 quote daunting task, is that an accurate description of
9 what you believe this task was?

10 A Yes. It was a huge task, absolutely.

11 Q What was the goal, what were you doing?

12 A This.....

13 MR. COVELL: Object. Just as to where and when
14 -- what his goal was, okay?

15 MS. ZOBEL: Putting together this manual --
16 what was his role in putting together this manual?

17 MR. COVELL: I'm sorry, you said role?

18 MS. ZOBEL: Yes.

19 MR. COVELL: I thought you said goal, so --

20 MS. ZOBEL: No.

21 MR. COVELL: I have hearing loss, sorry.

22 MS. ZOBEL: That's fine.

23 MR. COVELL: Okay. Go ahead.

24 A My role is simply to get an updated policies and
procedures manual for the company.

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1 Q As it applied to safety?

2 A Yes, it's just strictly safety -- it's, again, it's a
3 regurgitation of the federal and state and applicable
4 Slope work procedures as they apply to OSHA
5 regulations. And it's been done before. This was just
6 updating a previous version that hadn't been done for
7 years.

8 Q And this would be because of changes in regulations and
9 procedures that were followed except for.....

10 A Sure.

11 Q Okay. And what percentage of your time do you think
12 you dedicated to doing this?

13 A A lot at the end. I mean, we were all working
14 feverishly to get this thing together. I spent a
15 significant amount of time before I was let go, working
16 on this document, you know, as we all did so --

17 Q Comparing your work with the people who were the safety
18 specialists, were you spending a larger amount of your
19 time doing this than they were?

20 A Not necessarily, no.

21 Q So, they -- we had safety specialists and you spending
22 as you described it a huge amount of your time doing
23 just this?

24 A Correct.

Q Okay. And your job what -- within the grand scheme of

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1 things was to coordinate it all?

2 A Yes. I was the point of contact to take it all and get
3 it electronically into one spot and then, you know, I
4 just had 3-ring binders, so I'd grab them and throw
5 them in there and assemble everything -- get it in one
6 spot.

7 Q Did you assign particular areas to different people to
8 develop?

9 A I don't think I assigned them, I think we all just kind
10 of said hey, I'll do this, I'll do that, we all just
11 kind of went our merry way. I don't think there was
12 any -- there was no master list that said you were
13 going to do this, and you're going to do that so --

14 Q I'm looking at the exhibits that we marked as -- your
15 change out notes.

16 A Okay.

17 MR. COVELL: It might be 8 -- 7, I believe is
18 what you're referring to, 12001 is really --

19 A G-7.

20 MR. COVELL: Yes, G-7.

21 A G-7.

22 Q (By Ms. Zobel) Yes.

23 A Okay. G-7.

24 Q On Job 624 on page 4 of 5. It refers to you -- the
second line, that you finalized the manbasket lifting

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JVA?

MS. ZOBEL: A job vacancy announcement.

MR. COVELL: Okay. There we go. Thank you.

MS. ZOBEL: You've got to know the lingo.

MR. COVELL: MBA I know.

Q (By Ms. Zobel) Among the meetings that you attended, I showed you the one that was a staff meeting.

A Uh-huh (affirmative).

Q And then we talked about safety meetings that were within the department, were there other meetings that you would attend, such as a supervisor meeting?

A There was a Phillips meeting, I think they called it the supervisors' meeting.

Q Okay. And who would be asked to attend those?

A Oh man, the list could be long there. It could be everybody from Phillips.

(Deposition Exhibit G-18 marked)

Q Okay. This says distribution: all superintendents, supervisors, and construction managers.

A Okay.

Q Okay. So that would be the people who would be expected to attend?

A Yes, and amongst others, you know, so --

Q Okay. You wouldn't have attended these as a safety specialist, would you?

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- A It's -- it's possible you could have attended as a
2 safety specialist, yes.

3 Q It wasn't the expectation though? You were -- it was
4 a.....

5 A Correct.

6 Qsupervisor's meeting?

7 A Correct. But there again, if there was a need for
8 somebody to be in there to go over a safety item, then
9 there would be a specialist there so --

10 Q Okay. No, I'm talking about as a regular participant
11 in the meetings and not on any.....

12 A Correct.

Qspecific need? Okay. And the action item list
14 and the sidebars to action item list, these are things
15 that would be discussed, examples?

16 A Uh-huh (affirmative). Yes.

17 Q Okay.

18 MS. ZOBEL: What exhibit number was this?

19 COURT REPORTER: G-18.

20 MS. ZOBEL: Thank you. This is going to be
21 G-19. Oh, you're having to get creative.

22 (Deposition Exhibit G-19 marked)

23 MR. COVELL: Yes, this one's going vertical.

24 Q (By Ms. Zobel) Okay. Tell me what this is?

25 A Let's see. I honestly don't remember what this is.

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